
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : Magistrate. No. 15-7232 (CLW)
: :
v. : :
: :
NADER SAADEH : **CRIMINAL COMPLAINT**

I, Suzanne Walsh, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

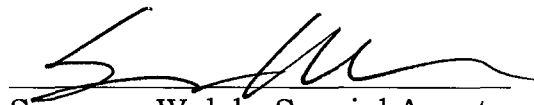
SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.

Special Agent Suzanne Walsh
attested to this Criminal Complaint
by telephone pursuant to Fed. R.
Crim. P. 4.1(b)(2)(A)



Suzanne Walsh, Special Agent
Federal Bureau of Investigation

Sworn to by telephone pursuant to
Fed. R. Crim. P. 4.1(b)(2)(A)

August 1, 2015 10:07am at
Date

District of New Jersey

Honorable Cathy L. Waldor
United States Magistrate Judge
Name & Title of Judicial Officer


Signature of Judicial Officer

ATTACHMENT A

COUNT 1

**(Conspiracy to Provide Material Support to a
Designated Foreign Terrorist Organization)**

From at least as early as October 2014 through at least as late as May 5, 2015, in Bergen County, in the District of New Jersey, and elsewhere,
defendant

NADER SAADEH

knowingly and unlawfully conspired with Alaa Saadeh, Samuel Rahamin Topaz, Coconspirator 1 ("CC-1"), and others to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b), including services and personnel, to a foreign terrorist organization, namely the Islamic State of Iraq and the Levant, knowing that the organization was a designated terrorist organization, and that the organization had engaged and was engaging in terrorist activity and terrorism.

In violation of Title 18, United States Code, Section 2339B(a)(1) and 2339B(d).

COUNT 2

**(Attempt to Provide Material Support to a
Designated Foreign Terrorist Organization)**

On or about May 5, 2015, in Bergen County, in the District of New Jersey, and elsewhere, defendant

NADER SAADEH

knowingly and unlawfully attempted to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b), including services and personnel, to a foreign terrorist organization, namely the Islamic State of Iraq and the Levant, knowing that the organization was a designated terrorist organization, and that the organization had engaged and was engaging in terrorist activity and terrorism.

In violation of Title 18, United States Code, Section 2339B(a)(1) and 2339B(d).

ATTACHMENT B

I, Suzanne Walsh, being duly sworn, depose and say:

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been for approximately 11 years. I am currently assigned to the Joint Terrorism Task Force ("JTTF") and have worked on investigations relating to international terrorism and violent extremists since in or about 2006. My experience as a Special Agent has included the investigation of cases involving the use of computers and the Internet to commit terrorism-related offenses. I have received training and have gained experience in interview and interrogation techniques, arrest procedures, obtaining electronically stored information through criminal process, search warrant applications, and the execution of searches and seizures. I have also received training and information, and gained experience concerning terrorism crimes, as well as the tactics, techniques, and procedures used by terrorism suspects to evade detection. I have personally participated in the execution of search warrants involving the search and seizure of computers and electronically stored information. The information contained in this affidavit is based upon my personal knowledge and observation, my training and experience, conversations with other law enforcement officers and witnesses, and the review of documents and records.

2. Because this affidavit is being submitted for the limited purpose of establishing probable cause for a criminal complaint, I have not included every detail of every aspect of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause for a criminal complaint. Unless specifically indicated, all conversations and statements described in this affidavit are related in substance and in part. Dates of events in this affidavit are asserted as having occurred on or about the asserted date.

Summary of Investigation

3. An ongoing investigation conducted by the FBI/JTTF in New Jersey, New York, and elsewhere has revealed that NADER SAADEH ("SAADEH") traveled from New Jersey to Amman, Jordan via John F. Kennedy International Airport in Queens, New York ("JFK") on May 5, 2015. The purpose of SAADEH's travel was to subsequently travel from Jordan to Iraq or Syria via Turkey, in order to provide material support to the Islamic State of Iraq and the Levant ("ISIL"), a designated foreign terrorist organization. Additionally, the investigation revealed that SAADEH conspired with his brother, Alaa Saadeh ("Alaa"), CC-1, and Samuel Rahamin Topaz ("Topaz"), and others to assist each other with plans to travel to territory controlled by ISIL for the purpose of providing material support to ISIL.

The Defendant and his Co-Conspirators

4. SAADEH is a 20-year-old dual citizen of the United States and the Hashemite Kingdom of Jordan, and until May 5, 2015, was a resident of Rutherford, New Jersey.

5. Alaa is SAADEH's brother. Alaa is a 23-year-old citizen of the United States and until recently a resident of West New York, New Jersey. On June 26, 2015, Alaa was arrested by the FBI/JTTF and charged in a criminal complaint filed with the United States District Court for the District of New Jersey with: (a) conspiracy to provide material support and resources to ISIL; (b) aiding and abetting an attempt to provide material support and resources to ISIL; and (c) witness tampering.

6. Topaz is a 21-year-old citizen of the United States and until recently was a resident of Fort Lee, New Jersey. On June 17, 2015, Topaz was arrested by the FBI/JTTF and charged in a criminal complaint filed with the United States District Court for the District of New Jersey with conspiring to provide material support to ISIL.

7. CC-1 is a 20-year old citizen of the United States and until recently was a resident of Queens, New York. On June 13, 2015, CC-1 was arrested by the FBI/JTTF and charged in a criminal complaint filed with the United States District Court for the Eastern District of New York with conspiring to provide material support to ISIL.

Overview of ISIL

8. On October 15, 2004, the United States Secretary of State designated al-Qa'ida in Iraq (AQI), then known as Jam'at al Tawhid wa'al-Jihad, as a Foreign Terrorist Organization ("FTO") under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist under section 1(b) of Executive Order 13224.

9. On May 15, 2014, the Secretary of State amended the designation of al-Qa'ida in Iraq ("AQI") as a Foreign Terrorist Organization ("FTO") under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224 to add the alias ISIL as its primary name. The Secretary also added the following aliases to the ISIL listing: the Islamic State of Iraq and al-Sham ("ISIS"), the Islamic State of Iraq and Syria ("ISIS"), ad-Dawla al-Islamiyya fi al-Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furqan Establishment for Media Production. Although the group has never called itself "Al-Qaeda in Iraq (AQI)," this name has frequently been used to describe it through its history. To date, ISIL remains a designated FTO. Additionally, although the State Department has not yet formally amended the ISIS FTO designation to include

the name Islamic State ("IS"), ISIS itself announced a formal change of ISIS's name to "IS" in an audio recording publicly released on June 29, 2014.

10. ISIL continues to operate in Iraq and Syria in its effort to establish an Islamic state in those countries. In or about 2014, ISIL declared that it had established a caliphate in Iraq and Syria and has since urged like-minded individuals to travel there to support ISIL's efforts to secure the territory ISIL claims to control.

11. Based on open source information, ISIL has murdered by beheading civilians/non-combatants from the United States, Great Britain, France, and Japan, among others, and has reportedly murdered dozens of people at a time, carried out public executions, and committed other brutal and terrorist acts.

12. ISIL has and continues to recruit individuals throughout the world, including individuals from the United States and other western countries, to travel to Syria and Iraq for the purpose of joining its ranks. Individuals, who are neither citizens nor residents of Syria and Iraq, are traveling to Syria and Iraq to join ISIL. Part of ISIL's recruiting efforts includes online publications describing ISIL and its efforts to establish a caliphate, along with its purported battle strategies and fighting techniques. Additionally, open source research indicates that ISIL has disseminated an electronic book ("e-book") with operational security techniques to assist foreign fighters in evading detection on their way to join ISIL. This e-book describes ticketing and routing strategies, useful items to bring that will not arouse suspicion, how to secure electronic devices and communications, and how to deal with potential encounters with law enforcement agents and government officials. Specific instructions include the booking of round-trip tickets, or "cover tickets," to popular vacation spots (e.g., Spain or Greece), which are intended to reduce visibility that a potential foreign fighter is traveling to Syria or Iraq. Other specific recommendations include the creation of a "cover story" to hide the true purpose of the foreign fighter's travel, such as tourism or humanitarian efforts.

13. Frequently, individuals who travel to join ISIL commonly enter Syria by crossing the border from Turkey. Other foreign fighters from Western countries often travel to locations in Turkey, including Istanbul, and then travel to towns close to the border with Syria, where they are brought into Syria to join ISIL.

14. Beginning in 2014, using social media, ISIL has called for attacks against citizens - civilian and military - of the countries participating in the United States-led coalition against ISIL. For instance, on September 21, 2014, ISIL released a speech of Abu Muhammed Al-Adnani, a senior leader and official spokesman of ISIL. In this speech, entitled, "Indeed Your Lord is Ever

Watchful,” Al-Adnani calls on Muslims who support ISIL from around the world to “defend the Islamic State” and to “rise and defend your state from your place where you may be.” More recently, using social media, ISIL has been encouraging individuals to kill specific persons within the United States.

SAADEH’s Radicalization and Intent to Travel Overseas

15. In April 2015, the FBI/JTTF was contacted by a New Jersey resident (“Individual 1”) who stated that he/she had information that SAADEH, Alaa, and others may be planning to travel overseas to join a foreign terrorist organization.

16. Individual 1 was subsequently interviewed by members of the FBI/JTTF. During the interview, Individual 1 provided details about SAADEH’s recent radicalization and his support for ISIL and its violent agenda, as further summarized below:

a. Individual 1 explained that he/she has maintained a close relationship with SAADEH and Alaa since in or about 2002. SAADEH and Alaa lived with Individual 1 for several years after their parents were deported from the United States after sustaining criminal convictions. As of the date of the April 2015 interview, SAADEH and Alaa’s father lived in Oman, and their mother lived in Jordan.

b. SAADEH and Alaa lived together in Fort Lee, New Jersey (apart from Individual 1) from 2012 to 2014. In February 2015, they moved back in with Individual 1 at a residence in Rutherford, New Jersey.

c. Beginning in late 2014 through the date of the April 2015 interview, Individual 1 observed the following changes in SAADEH’s appearance and behavior, which (along with SAADEH’s numerous statements of support regarding ISIL and its violent agenda and his plans to travel abroad, as further detailed herein) motivated Individual 1 to contact the FBI/JTTF:

- SAADEH became deeply and uncharacteristically invested in views and behaviors sometimes associated with radical Islam.
- SAADEH frequently researched and reviewed Islamic writings and videos, and he often studied the Qur’an.
- SAADEH began to fast, and stopped drinking, smoking, and eating foods that were not permissible under Islamic law.
- SAADEH began wearing heavy, dark eyeliner, and grew out his beard and dyed it red. He began praying five times a day and wore traditional Muslim attire in place of the Western clothing he had previously worn.

- SAADEH's primary focus of conversation during this timeframe was about Islam, and he would become offended and agitated by any conversation or mention of any religion other than Islam.
- SAADEH began to spread his new-found zeal for Islam with other individuals, and SAADEH converted Topaz to Islam.

d. SAADEH's adoption of stringent religious behavior coincided with his statements of support for ISIL and its violent agenda. Within the past few months, Individual 1 heard SAADEH make numerous statements in support of ISIL, as well as other violent extremists, including the following:

- SAADEH stated that ISIL fighters are his Muslim brothers.
- SAADEH stated that ISIL's execution of a captured Jordanian Air Force pilot by burning him alive was "justified" because the pilot was a traitor.
- SAADEH stated that the attack and murder of the staff of French satirical magazine Charlie Hebdo in Paris earlier this year was similarly justified.
- SAADEH stated that the caliphate ISIL claimed to have established was a valid country, and not just a group.
- SAADEH stated that ISIL was a "state" that offered hospitals, schools, and protection for its people from the abuse of government.
- SAADEH stated that ISIL was the only group fighting for "freedom" that had never committed human rights atrocities.
- SAADEH stated that other governments have failed to protect their citizens, and were influenced to oppose ISIL by government and media propaganda.

e. Additionally, Individual 1 indicated that he/she had observed SAADEH conducting online research concerning ISIL on Individual 1's home computer, and that SAADEH had posted messages supporting ISIL on his Facebook account.

f. During the time period leading up to the interview with the FBI/JTTF, Individual 1 observed that SAADEH had become withdrawn, rebellious, hostile, and angry. He had also become secretive. For example, when asked, SAADEH refused to tell Individual 1 where he was practicing Islam. In mid-April, SAADEH changed his mobile telephone number and also changed service providers and devices. SAADEH began to speak more in

Arabic, rather than in English, when in Individual 1's presence. Additionally, SAADEH eventually ceased using Individual 1's home computer, and instead used his smartphone for all communications and online activities.

g. On or about April 20, 2015, Alaa told Individual 1 that SAADEH had decided to travel to Jordan to study. Alaa further advised that SAADEH's father, who resided in Oman, had planned to send money to SAADEH so that he could purchase his airline ticket to Jordan. Alaa further stated that SAADEH was already packed, and was prepared to fly to the Middle East "almost immediately."

h. Around this same timeframe, SAADEH told Individual 1 that he wanted to study theology overseas in the Middle East. Given Individual 1's past relationship and extensive history with SAADEH, this made Individual 1 very suspicious because SAADEH had never been very studious.

i. Additionally, also around this timeframe, SAADEH moved out of Individual 1's residence. Periodically, SAADEH would return to the residence to move out the remainder of his belongings and to speak with Alaa, who continued to live with Individual 1. On those occasions, Individual 1 observed that SAADEH and Alaa engaged in cryptic dialogue or whispered to each another in Arabic, which was unusual in comparison with Individual 1's prior observations of the brothers' communications with one another, as Arabic was not their primary language.

j. Similarly, Individual 1 observed that Alaa had become secretive with his telephone communications, as he frequently walked away from Individual 1 and the shared common area in the home to speak over the telephone in Arabic. According to Individual 1, this behavior was unusual in comparison with how Alaa had historically acted and communicated with others in Individual 1's presence.

k. Despite Alaa's apparent efforts to hide his communications from Individual 1, on or about April 24, 2015, Individual 1 overheard a telephone conversation in which Alaa was speaking with someone in English. During that conversation, Individual 1 heard Alaa state, in part, that SAADEH was leaving the United States soon.

l. Individual 1 also advised the FBI/JTTF that SAADEH had recently shaved off his beard. SAADEH claimed that he did so because he did not want to be harassed by officials on his way to Jordan. Based on my training and experience, this and other changes in SAADEH's appearance are consistent with ISIL's guidance to recruits that they should look like Western tourists when traveling to Syria and Iraq in order to evade official scrutiny.

**Internet Communications Revealing
SAADEH's Violent Ideology and Intention to Join ISIL**

17. Based, in part, on the information provided by Individual 1, law enforcement agents obtained court-authorization to search various social media and e-mail accounts subscribed to in SAADEH's name. Additionally, agents also received consent from Individual 1 to perform a forensic search of Individual 1's home computer which had been previously utilized by SAADEH. Collectively, those efforts confirmed SAADEH's support of, and desire to take part in, ISIL's campaign of ideologically motivated violence against non-Muslims and the United States as follows:

- On November 25, 2012, SAADEH and CC-1 had a discussion related to Anwar-Al-Awlaki in which CC-1 stated: "America killed him [referring to Al-Awlaki]." SAADEH responded: "then amreeka [referring to the United States] shale [sic] burn[.]"
- On March 12, 2013, SAADEH and CC-1 stated that recent events signaled the coming of "the end." They discussed the Mahdi – the prophesied redeemer of Islam who would arise before the Day of Judgment. CC-1 stated how he and SAADEH had been "chosen to be the army of the M[a]hdi . . . [.]". They then discussed building a "small army" that would include their friends. CC-1 stated he wanted to be a general in the Mahdi's army and SAADEH stated he wanted to be the lead weapons maker/designer for it. SAADEH added: "think of it, it will probably be like 2-4 yrs from now, we will be in the prime of our lives[.]"
- On June 18, 2013, SAADEH and CC-1 discussed a leak of information concerning the National Security Agency and that an internet service provider had allegedly given "all of its information" to the United States government. CC-1 stated "man I feel [] its really hop[e]less to try to oppose these people (apparently referring to the United States government). SAADEH responded by stating "What can we do?" and "really want to leave this country[.]" In turn, CC-1 stated: "in shall ALLAH [transl. "God willing"] why leave[?] we already infiltrated" (emphasis added). SAADEH responded: "Truu Now we finish this conversation in person[.]"
- On June 29, 2014, SAADEH visited a web page containing an article containing "new rules" issued by ISIS for those living under their control in the caliphate.
- On July 1, 2014, (the approximate date on which ISIL's leader declared an Islamic caliphate in Syria and Iraq) SAADEH posted

images of the flag of ISIL and the flag of the Islamic Khilafa (transl. “caliphate”) on his Facebook account.

- On January 28, 2015, SAADEH visited a web page containing a video of a speech given Al-Awlaki titled “The Dust Will Never Settle Down.” In the speech, Al-Awlaki urged the killing of any individual who spoke against or defamed the Prophet Mohammed. “Harming (by defamatory words) Allah and his Messenger is a reason to encourage Muslims to kill whoever does that.”
- On February 16, 2015, SAADEH visited a web page containing graphic video of the Jordanian pilot’s murder by immolation by ISIL militants.
- On March 2, 2015, SAADEH searched for the term “ISIS” and visited the website of a New York-based newspaper aggregating articles related to ISIL.
- On March 3, 2015, Individual 1’s computer was used to search for “Map of ISIS” and “Map of ISIS 2015.” Numerous image files depicting areas of Syria and Iraq that ISIL claimed to control were apparently viewed. Some of the images were consistent with maps published in the mainstream media, while others were consistent with ISIL propaganda because the maps feature cropped images of jihadist fighters and other ISIL imagery pasted into the maps.
- On March 25, 2015, Individual 1’s computer was used to search for an article about how private researchers tracked an ISIL supporter’s movement using social media postings.
- Between April 19th and April 20th, 2015, SAADEH searched for airline tickets to Turkey, including queries for “turkey two-way tickets.”
- On April 19, 2015, SAADEH visited a web page for a discount travel company and searched for airline tickets from the United States to Istanbul, Turkey for one person departing between May 15, 2015, and June 3, 2015.
- On April 23, 2015, SAADEH visited to a web page containing, among other things, an hour-long English version of an ISIL propaganda video. The video depicts ISIL militants engaged in bombings, shootings, executions, kidnappings, and beheadings.

Attempts by Others to Dissuade SAADEH from Joining ISIL

18. A search warrant obtained by the FBI/JTTF revealed that an individual sent the following message to SAADEH in Arabic on April 21, 2015:

[SAADEH], my dear, how are you? I miss you very much[.] Yesterday, your mother called me. She was crying and was subdued because of your issue. She said that you want to travel to Turkey and join a group of people you do not know who they really are. They seduce you under the flag of Islam, but when you get to them, you see things that make you hate your situation. Many young men left here and went to them. However, when they saw the situation there, they escaped and said: "We witnessed humiliation, insult, poverty, hunger and cruel acts that have nothing to do with Islam and the religion.

My dear, please, think about it. We all love you and we are not satisfied with your way of thinking. If you aim at the afterlife, you should obtain your parents' satisfaction, build a family and make us happy. May God be pleased with you, do not torture us because you are loved by all the people[.]

19. In addition, SAADEH's mother sent him the following messages in Arabic on the same day and were recovered in the search of SAADEH's e-mail account:

- "[SAADEH] do not listen to them they liars [sic]"
- "[SAADEH] do not go anywhere if u love me dont [sic] kill your mom"
- "Dont kill my smile[.] i want be happy all the time do not leave me do not go to them![.] stay with [name of SAADEH's mother omitted]"

20. Finally, a third individual sent the following message to SAADEH in Arabic on the same day:

[SAADEH], how is everything with you guys? I hope you are doing fine, God willing. I heard something strange and you are smart and clever enough to assess matters. If you go without your parents' approval, Jihad will not be accepted from you. Did not you hear the hadith of the Prophet, God's blessing and peace be upon him? With whom are you going? With Da'ish [referring to ISIL by its Arabic acronym], the criminals who are slaughtering our people in Syria in Yarmouk Camp [referring to a refugee camp in Syria]? Man, we live in the era of seditions that are like flocks of a dark night which the Prophet, God's blessing and peace be upon him, mentioned. Stay home and let go. Fear

God in your mother and seek her approval. Listen to me, my dear. I have been through the same thing like you. You will grow up and realize that I was right. Believe me, my dear, the time of jihad is not with those people. God willing, my God will bless us with the right martyrdom in the Land of Rabat, Jerusalem. Listen to my advice now, my dear. What exists now is seditions like flocks of a dark night. Beware of joining those people who do not fear God. God knows best and He is the wisest. Be alert, Da'ish [referring to ISIL by its Arabic acronym] is made by the cursed West. I hope, my dear, that you will listen to the advice.

SAADEH's Overseas Travel to Join ISIL

21. A review of airline, banking, and other records and information compiled during this investigation has revealed the following details of SAADEH's recent travel to Jordan and his intention to join ISIL:

a. On April 30, 2015, a ticket was purchased in SAADEH's name using Alaa's credit card on Royal Jordanian Airlines, Flight #262, scheduled to depart from JFK on Tuesday, May 5, 2015, at 10:30 p.m., to Queen Alia International Airport in Amman, Jordan.

b. Earlier that day, FBI/JTTF agents observed Alaa drive SAADEH to a Western Union branch in New Jersey. Records from Western Union reveal that SAADEH picked up \$233.77 (U.S. Dollars) that had been wired to him from Oman by his father. Video surveillance footage of the transaction at the Western Union showed that Alaa and SAADEH were together when SAADEH picked up the money.

c. On May 4, 2015, just one day before SAADEH left the United States, Topaz and CC-1 discussed their plan to travel to Turkey before going to territory controlled by ISIL. That day, CC-1 sent Topaz an electronic message stating, "Most likely [SAADEH] will be there first, I will stay in contact with him, in sha Allah [transl. "God willing"], and then we will one by one meet at a spot agreed on. CC-1 added, "you can walk easy into Turkey." CC-1 further stated to Topaz that "after [SAADEH] leaves, U [sic] ME and [Alaa] are gonna meet up to talk about getting u guys across[.]"

d. On May 5, 2015, Individual 1 accompanied Alaa, CC-1, and SAADEH to JFK. During the drive from New Jersey to JFK, SAADEH, Alaa, and CC-1 discussed re-uniting with each other and with Topaz in Jordan. Also, SAADEH reminded Individual 1 that SAADEH had previously offered to sell his smartphone to Individual 1. Accordingly, Individual 1 offered to buy the phone from SAADEH consistent with that earlier conversation, and SAADEH agreed to sell it to Individual 1 for \$200 (U.S. Dollars). As SAADEH and Individual 1 exchanged money for the phone, Alaa asked SAADEH to hand the phone over to him. SAADEH did so, at which time Alaa removed the SIM

card from SAADEH's phone. Alaa then handed SAADEH the SIM card and handed the phone to Individual 1. Later, during the ride home from the airport, Alaa again asked for SAADEH's phone in an apparent effort to clear its memory. Based on my training and experience, this behavior is consistent with a coordinated effort to prevent incriminating evidence stored on the phone and/or on the SIM card, including text messages, e-mails, and other electronic communications, as well as ISIL-related materials, from falling into the control of Individual 1 and/or law enforcement.

e. SAADEH received his boarding pass at JFK and proceeded through security checkpoints to the gate. At approximately 9:40p.m., SAADEH boarded his scheduled flight to Amman, Jordan, which subsequently departed JFK.

f. On May 15, 2015, Individual 1 reported to the FBI/JTTF that Alaa's father had called Alaa and told him that SAADEH had been detained in Jordan for five days in solitary confinement. The father advised Alaa to delete everything off his phone and to be careful with whom he spoke and met with. Alaa indicated to Individual 1 that if he had been in SAADEH's position, he would have been better prepared to deal with the Jordanian authorities, and more successful at manipulating his way out of that situation. Alaa further advised Individual 1 that he was glad SAADEH had sold his phone to Individual 1 prior to his departure because Alaa and SAADEH had communications with each other regarding ISIL over that phone. Alaa further stated that ISIL's violent actions were justified.

g. On May 15, 2015, court-authorized electronic surveillance revealed the following text message exchange between Alaa and Topaz:

Alaa:	Yu[sic] Talk to my brother [referring to SAADEH]?
Topaz:	Nah I haven't, Ive [sic] been trying to talk to CC-1 to see if he knows anything but he's not sure either[.]
Alaa:	Lay low. And don't talk to nobody[.]
Topaz:	I know that bro[.] I've very very low and that's another thing bro[.] we gotta talk about hijra but only when I see you obvi[.]

Based on my training and experience, I believe that Alaa's direction to Topaz to "lay low" and not speak with anyone specifically referred to refraining from taking action in furtherance of the conspiracy to provide material support to ISIL that might be detected by law enforcement.

h. On May 22, 2015, a telephone call recorded pursuant to court-authorization occurred between Alaa and another individual in which

they discussed SAADEH's detention in Jordan. During the call, Alaa stated "somebody snitched on him [referring to SAADEH] . . . one of his friends snitched on him." Alaa then stated that he hoped it was not CC-1 or Topaz who "snitched" on SAADEH.

i. On May 31, 2015, Alaa spoke in person with Individual 1 about SAADEH's situation in Jordan. Alaa explained that SAADEH was in custody in Jordan because SAADEH had sent Alaa a link to an ISIL video via text message. Alaa further stated that his father was trying to get SAADEH released. In response to a question from Individual 1 concerning a possible bribe by the father to Jordanian officials, Alaa replied that a bribe would not work because SAADEH's case relates to "national security." Alaa further stated that ISIL is a major threat to the Middle East right now, and that every government is afraid that ISIL will expand and take over their territory.

j. On June 13, 2015, Individual 1 engaged in a consensually recorded conversation with Alaa which confirmed Alaa's knowledge of SAADEH's plans to join ISIL. During the conversation, Individual 1 recounted a prior statement made by SAADEH to Individual 1. Specifically, Individual 1 told Alaa that SAADEH had previously expressed his support for ISIL to Individual 1, and that SAADEH expressed a desire to travel to join ISIL in Syria and/or Iraq. In response, Alaa explained that SAADEH was motivated to live under Sharia law, as opposed to the United States where behavior considered by Muslims to be sinful was prevalent and condoned. Alaa indicated that SAADEH's plan was to travel to Syria and/or Iraq and to join ISIL; however - if after joining ISIL - SAADEH disagreed with their activities, SAADEH claimed that he would return to the United States. When asked if he had tried to discourage SAADEH from traveling and attempting to join ISIL, Alaa stated he did not discourage him because he is not the kind of person to discourage anyone. Alaa further stated that he personally wanted to "pick up my life and go to Jordan, or go overseas and go live over there." In response to a question by Individual 1 regarding whether Alaa would go to "Iraq and Syria to that zone to that [referring to ISIL]," Alaa replied, in part: "If I think they're good, why not?" Alaa further stated that the United States and other nations oppress their own people, and for this reason he considers them to be terrorists.

k. On June 13, 2015, as noted above, CC-1 was arrested. Following his arrest, CC-1 waived his Miranda rights and agreed to speak to the FBI/JTTF. CC-1 stated that he had pledged allegiance to ISIL and was a "full-fledged" member of ISIL. CC-1 admitted that he accompanied SAADEH to JFK when he left for Jordan. CC-1 further stated that SAADEH planned to travel to the caliphate after arriving in Jordan.

l. On June 17, 2015, FBI/JTTF personnel executed search warrants at Topaz's residence in Fort Lee, New Jersey. During and after the

search, Topaz agreed to speak to the FBI/JTTF and stated that he had agreed with CC-1, SAADEH, and Alaa to travel to join ISIL.

m. On June 29, 2015, as noted above, Alaa was arrested. Following his arrest, Alaa waived his Miranda rights and agreed to speak to the FBI/JTTF. Alaa stated that he, SAADEH, and Topaz all watched ISIL propaganda videos together and discussed going overseas to join ISIL. Alaa further stated that CC-1 sent ISIL propaganda videos to SAADEH, who in turn provided them to Alaa for the purpose of persuading Alaa to join ISIL along with them. Alaa further stated that the night before SAADEH left for Jordan, CC-1 provided SAADEH with the name and number of an ISIS contact near the Turkey/Syria border who would facilitate SAADEH's travel to ISIL controlled territory. Alaa admitted that one point he had wanted to join ISIL himself, but no longer believed they "were good."